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Attorneys for Defendants FORTY NINERS FOOTBALL
COMPANY LLC, FORTY NINERS SC STADIUM
COMPANY LLC, FORTY NINERS STADIUM
MANAGEMENT COMPANY LLC, CITY OF SANTA
CLARA and SANTA CLARA STADIUM AUTHORITY

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

ABDUL NEVAREZ, PRISCILLA
NEVAREZ, and SEBASTIAN
DEFRANCESCO, on behalf of
themselves and all others similarly
situated,

Plaintiffs,

v.

FORTY NINERS FOOTBALL
COMPANY, LLC, a Delaware limited
liability company; FORTY NINERS SC
STADIUM COMPANY, LLC, a
Delaware limited liability company;
NATIONAL FOOTBALL LEAGUE;
CITY OF SANTA CLARA; SANTA
CLARA STADIUM AUTHORITY;
TICKETMASTER ENTERTAINMENT,
INC.; FORTY NINERS STADIUM
MANAGEMENT COMPANY LLC; and
DOES 1-10, Inclusive,

Defendants.

Case No. 4:16-cv-07013-HSG

**STIPULATION AND ORDER
REGARDING MISSION COLLEGE BLVD.
REMEDATION, SETTLEMENT
AGREEMENT EXHIBIT I**

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THIS STIPULATION is hereby entered into by and between Plaintiffs Abdul Nevarez, Priscilla Nevarez, and Sebastian DeFrancesco on behalf of themselves and all others similarly situated (collectively, “Plaintiffs”), and Defendants Forty Niners Football Company LLC, Forty Niners SC Stadium Company LLC, Forty Niners Stadium Management Company LLC (collectively, the “Forty Niners”), the City of Santa Clara, and the Santa Clara Stadium Authority (collectively, “Santa Clara,” and with Plaintiffs and the Forty Niners, the “Parties”), by and through their respective counsel of record, as follows:

WHEREAS, pursuant to Section III(4)(b) of the Settlement Agreement, the Santa Clara Defendants shall remediate all Conditions identified in Exhibit I of the Settlement Agreement pursuant to the remedial measures set forth therein;

WHEREAS, through the design process, the Santa Clara Defendants identified certain locations on Mission College Blvd. identified in Exhibit I of the Settlement Agreement that the Santa Clara Defendants do not own or control;

WHEREAS, these certain locations are identified in Exhibit 1 attached hereto, and consist of the following location ID numbers (as listed on Exhibit I of the Settlement Agreement): 492, 493, 494, 495, 496, 497, 498, 499, 500, 501, 516, 517, 518, 519, 520, and 521; and

WHEREAS, the Santa Clara Defendants do not have authority to remediate any Conditions in these locations because the Santa Clara Defendants do not own or control the locations;

NOW, THEREFORE, IT IS HEREBY STIPULATED as follows:

Subject to the Court’s approval, the Parties agree that the following location ID numbers are hereby removed from the Exhibit I list of locations the Santa Clara Defendants are required to remediate pursuant to the Settlement Agreement: 492, 493, 494, 495, 496, 497, 498, 499, 500, 501, 516, 517, 518, 519, 520, and 521. The Forty Niners and Santa Clara Defendants shall not designate any accessible parking in the parking lots adjacent to these locations for events at Levi’s Stadium.

IT IS SO STIPULATED.

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1
2 Dated: August 4, 2023

Respectfully submitted,

3 PEIFFER WOLF CARR KANE & CONWAY

4 /s/ Catherine M. Cabalo

Catherine M. Cabalo

5 Attorneys for Plaintiffs and the Certified Classes

6
7 Dated: August 4, 2023

RANKIN, SHUEY, RANUCCI, MINTZ,
LAMPASONA & REYNOLDS

8
9 /s/ Maria M. Lampasona

Maria M. Lampasona

10 Attorneys for Defendants

11 FORTY NINERS FOOTBALL COMPANY LLC,
FORTY NINERS SC STADIUM COMPANY LLC,
FORTY NINERS STADIUM MANAGEMENT
12 COMPANY LLC CITY OF SANTA CLARA,
13 SANTA CLARA STADIUM AUTHORITY

14
15 **SIGNATURE ATTESTATION**


16 The e-filing attorney hereby attests that concurrence in the content of the document and
17 authorization to file the document has been obtained from each of the other signatories indicated
18 by a conformed signature (/s/) within this e-file document.

19 Dated: August 4, 2023

/s/ Maria Lampasona

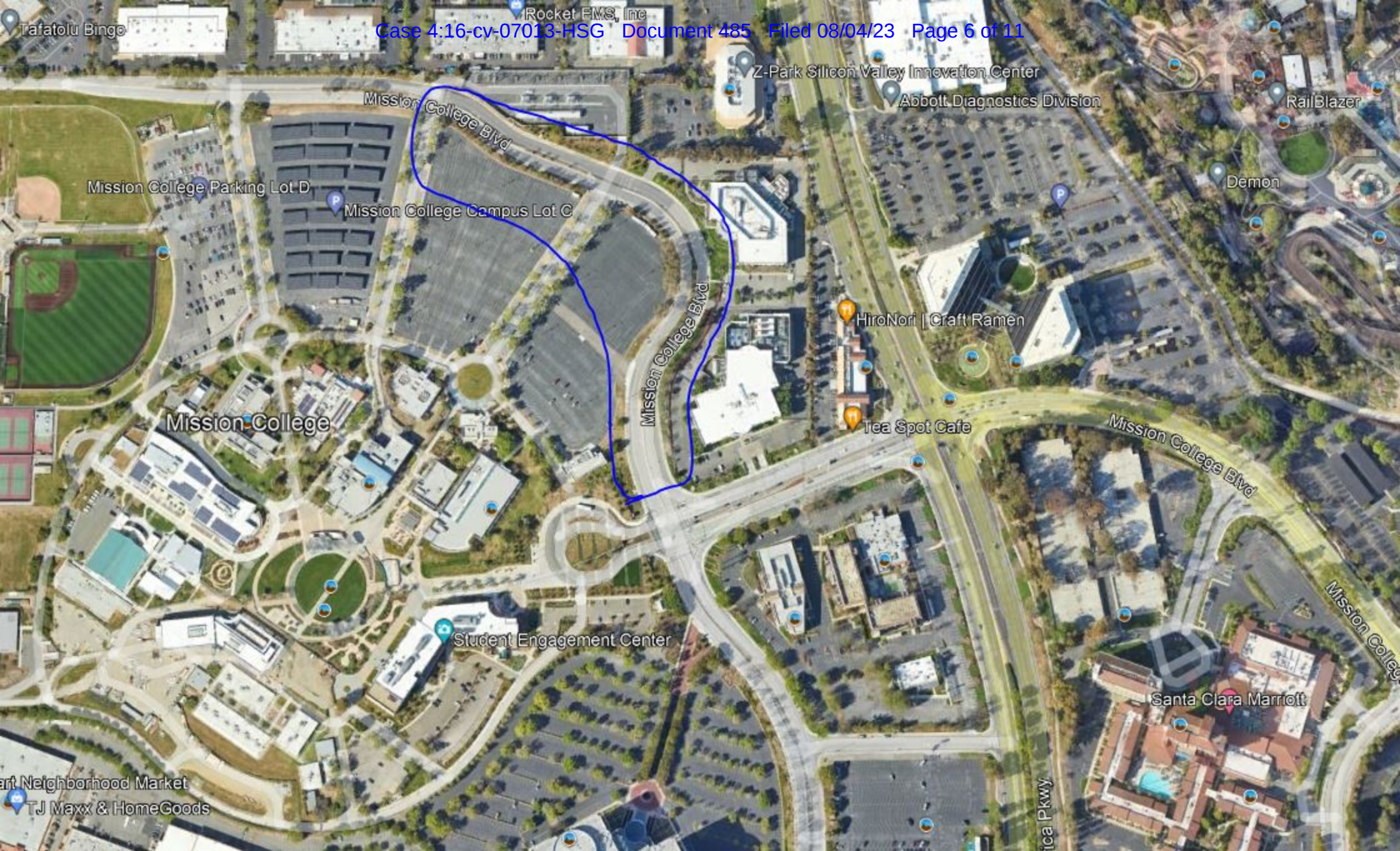
PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: 8/4/2023


Hon. Haywood S. Gilliam, Jr.
United States District Judge

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Exhibit A





DATE :	12/18/19
SCALE :	1"=80'

- = EXHIBIT-I
- = EXHIBIT-H
- +### = VAGUE-I
- +### = VAGUE-H
- +### = VAGUE (REMOVED)

VAGUE PATH OF TRAVEL,
EXHIBIT-H AND EXHIBIT-I,
PUBLIC RIGHT-OF-WAY BARRIERS

LEVI'S STADIUM
ACCESSIBILITY ASSESMENT
SANTA CLARA CALIFORNIA

SHEET
30
OF 34 SHEETS



DATE: 12/18/19	■ = EXHIBIT-I
SCALE: 1"=60'	■ = EXHIBIT-H
	### = VAGUE-I
	### = VAGUE-H
	### = VAGUE (REMOVED)

VAGUE PATH OF TRAVEL,
EXHIBIT-H AND EXHIBIT-I,
PUBLIC RIGHT-OF-WAY BARRIERS

LEVI'S STADIUM
ACCESSIBILITY ASSESMENT
SANTA CLARA CALIFORNIA

SHEET
31
OF 34 SHEETS

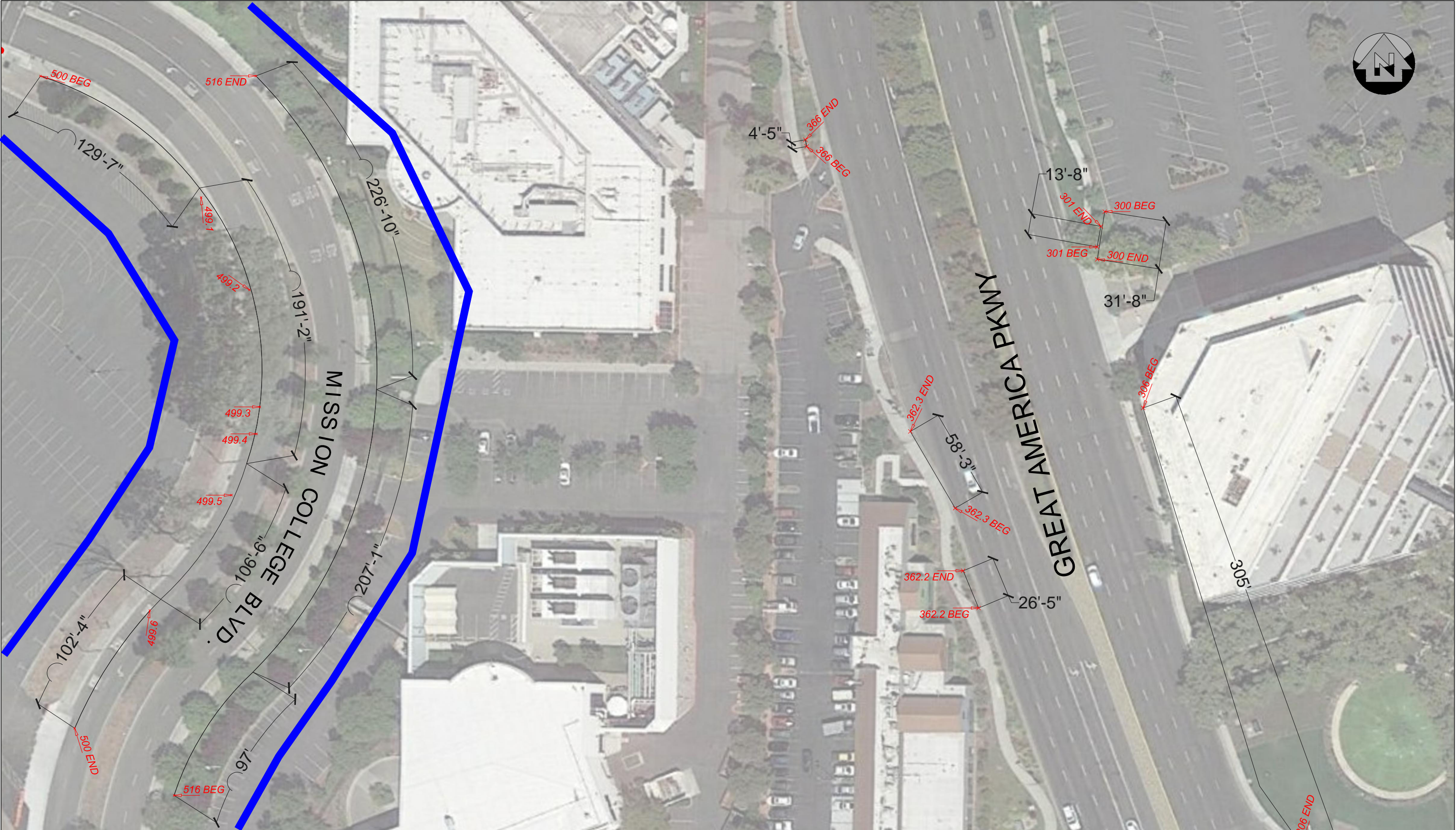


DATE: 12/18/19
SCALE: 1"=60'
= EXHIBIT-I
= EXHIBIT-H
= VAGUE-I
= VAGUE-H
= VAGUE (REMOVED)

VAGUE PATH OF TRAVEL,
EXHIBIT-H AND EXHIBIT-I,
PUBLIC RIGHT-OF-WAY BARRIERS

LEVI'S STADIUM
ACCESSIBILITY ASSESMENT
SANTA CLARA CALIFORNIA

SHEET
32
OF 34 SHEETS



DATE :	12/18/19
SCALE :	1"=60'

=EXHIBIT-I

=EXHIBIT-H

=VAGUE-I

=VAGUE-H

=VAGUE (REMOVED)

VAGUE PATH OF TRAVEL,
EXHIBIT-H AND EXHIBIT-I,
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